

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

In re:)
)
) CASE NO. 16-17350-pmm
Jeffrey Donald Nikoleyczik)
aka Jeffrey D. Nikoleyczik) JUDGE Patricia M. Mayer
aka Jeffrey Nikoleyczik)
AND)
Lori Ann Nikoleyczik
aka Lori Triano
aka Lori A. Triano
aka Lori A. Nikoleyczik
aka Lori A. Trovato
aka Lori Nikoleyczik
aka Loriann Georges
aka Lori A. Georges
aka Loriann A. Trovato
aka Lori Trovato
aka Lori Ann Trovato
aka Lori Georges
Debtors.

**NEWREZ LLC D/B/A SHELLPOINT MORTGAGE SERVICING NOTICE OF
DEBTORS' REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtors recently contacted Creditor requesting a forbearance period of 3 months and have elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 08/01/20 through 10/01/20. Creditor holds a secured interest in real property commonly known as 2346 MAIN ST, NORTHAMPTON, Pennsylvania 18067; as evidenced by claim number 22-2 on the Court's claim register. Creditor, at this time, does not waive any rights to

collect the payments that come due during the forbearance period. If the Debtors desire to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtors or Counsel for the Debtors make those requests through undersigned counsel.

Per the request, Debtors will resume Mortgage payments beginning 11/01/20 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid & Crane LLC
Authorized Agent for Secured Creditor
10700 Abbott's Bridge Road, Suite 170
Duluth, GA 30097
Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esq.
Email: cwohlab@rascrane.com

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 7th day of October 2020:

Jeffrey Donald Nikoleyczik
2346 Main Street
Northampton, PA 18067-1101

Lori Ann Nikoleyczik
2346 Main Street
Northampton, PA 18067-1101

And via electronic mail to:

J. ZAC CHRISTMAN
Fisher Christman
530 Main Street
Stroudsburg, PA 18360

SCOTT F. WATERMAN (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

By: /s/ Kory Jarzyk
Kory Jarzyk
kjarzyk@rascrane.com